



U.S. Department of Justice

United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 27, 2021

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By ECF & Email

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Gordon Freedman, 18 Cr. 217 (KMW), 19 Cr. 249 (KMW)

Dear Judge Wood:

On behalf of the parties, and with the consent of Pretrial Services, the Government writes to propose modifications to the defendant's bail conditions that would enable him to travel to Louisiana to surrender to the custody of the Bureau of Prisons ("BOP") as required by September 8. Because the lease on the defendant's New York City residence expires at the end of this month, he intends to reside in Louisiana beginning September 1.

The parties respectfully request that the Court modify the defendant's bail conditions as follows, with the modifications to take effect on August 31, 2021:

- The defendant shall report to Pretrial Services to be fitted with a GPS bracelet on August 31, 2021.
- From that visit to Pretrial Services through September 1, 2021, the defendant is permitted to travel from New York City to Louisiana.
- From September 1 until his surrender to BOP custody, the defendant must remain in Louisiana.
- The defendant's bail is modified to replace home incarceration with standalone monitoring with GPS pending surrender to the BOP on September 8, 2021.

Granted

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/
Noah Solowiejczyk / Katherine Reilly /
David Abramowicz
Assistant United States Attorneys

cc: Samuel Braverman, Esq. (by ECF and email)

SO ORDERED: N.Y., N.Y.

8/30/21

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.